

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Appellate Case No. 2022-001359
Circuit Court Case No. 2017-CP-10-06111

Maybank Holding's, LLC,

Appellant,

v.

James Island Center, LLC,

Respondent

and

James Island Center, LLC

Respondent

v.

Richard D. Tuorto, Chandler Frierson, Natalie Myers, John R. Hibbits, Jr. and
Elizabeth A. Hibbits

Appellants,

**MOTION FOR SECOND EXTENSION OF TIME
TO FILE/SERVE INITIAL BRIEF OF RESPONDENT**

CLEMENT RIVERS, LLP

Edward D. Buckley, Jr. (SC Bar No. 994)

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Attorneys for James Island Center, LLC

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Respondent James Island Center, LLC, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed August 8, 2023, the deadline for Respondent's initial brief and designation of matter is today, September 5, 2023. On account of work-related and other time commitments, Respondent respectfully requests this deadline be extended by 30 days. Respectfully, Respondent believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellants.

WHEREFORE, Respondent moves this Honorable Court to grant it an additional extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving its initial brief and designation of matter would be October 5, 2023, according to the undersigned's calculations. Further, Respondent respectfully requests the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

[Signature on next page]

[Signature page for Motion for Extension of Time to File/Serve Initial Brief of Respondent, Appellate Case No. 2022-001359]

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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September 5, 2023

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PROOF OF SERVICE

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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondent, hereby certify that Respondent's **MOTION FOR SECOND EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT** was served on all other parties to this appeal on September 5, 2023, via email (see attached) to their following counsel of record:

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By: s/Russell G. Hines
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September 5, 2023

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Tuesday, September 5, 2023 1:15 PM
To: 'jnovak@barnwell-whaley.com'; 'mdc@barnwell-whaley.com';
'mfarmer@thefarmerlawfirm.com'
Cc: Hines, Russell; Buckley, Edward D. (Ed); Justman, Aimee
Subject: Maybank Holding's, LLC v. James Island Center, LLC; Appellate Case No. 2022-001359
(CR 180054)
Attachments: 2nd Motion for Extension - Initial Brief.pdf

Enclosed please find Respondent's Motion for Second Extension of Time to File/Serve their Initial Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
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